

**United States Bankruptcy Court
Middle District of Florida
Fort Myers Division**

In Re:

James Allen Campion

and

Michelle E Campion

Debtor(s)

Case No. 9:14-bk-14272-FMD

Chapter 13

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DEBTORS' MOTION TO REIMPOSE AUTOMATIC STAY

COMES NOW, the Debtors, James A. Campion and Michelle E. Campion, by and through the undersigned attorney, and moves this Honorable Court, pursuant to section 362, for an Order to Reimpose the Automatic Stay provided under section 362(a) as to all secured creditors that the Debtors now propose to pay through their Chapter 13 Plan. In support of this motion, the Debtors state as follows:

1. The Debtors filed a petition under Chapter 13 of the Bankruptcy Code on December 8, 2014.
2. The Debtors filed their Chapter 13 Plan on December 19, 2014 proposing to make all vehicle payments directly to the secured lenders. Pursuant to the Order Establishing Duties of Trustee and Debtor (Doc No. 7), the automatic stay is terminated as to any secured creditor in which the Debtors are making payments directly.
3. On January 9, 2015 the Debtors filed an Amended Chapter 13 Plan (Doc No, 16). As stated in the Amended Chapter 13 Plan the Debtors are now proposing to pay the following secured creditors, and any arrears, through their Chapter 13 Plan: (1) Chrysler Financial/TD

Auto; (2) Ford Motor Credit; and (3) World Omni Financial.

4. The Debtors have filed their Chapter 13 petition in good faith. The Debtors believe that the Amended Chapter 13 Plan they have submitted will be confirmed and that they will be able to fully perform under the terms of the plan.

5. The Debtors intend to pay all pre-petition arrearages and provide adequate protection payments to the above secured creditors through their Chapter 13 plan.

WHEREFORE, the Debtors request that this Court (1) reimpose the automatic stay under section 362(a) as to all secured creditors which are being paid through the Amended Chapter 13 Plan; and (2) granting such other and further relief as the Court deems appropriate.

Respectfully Submitted: January 20, 2015.

MARTIN LAW FIRM, P.L.,
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 20, 2015, a copy of the foregoing document has been furnished either electronically or by U.S. Mail to the U.S. Trustee at 501 East Polk Street, Suite 1200, Tampa, Florida 33602; Jon Waage, Chapter 13 Trustee, P.O. Box 25001, Bradenton, FL 34206; Chrysler Financial/TD Auto Finance, % Bert Echols, Esq., Evans Petree, PC, 1000 Ridgeway Loop Rd., Suite 200, Memphis, TN 38120; Ford Motor Credit, Attn.: Bankruptcy, PO Box 6275, Dearborn, MI, 48121; World Omni Financial, 2013 Toyota FJ Cruiser, PO Box 91614, Mobile, AL 33691; and Debtors James A. Campion and Michelle E. Campion, 11942, Princess Grace Court, Cape Coral, FL 33991.

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